

Land Use Control Implementation Plan

IRP SITE DESIGNATION

Old Military Service Station USTs: IRP Site Code ST-07, RCRA Site Code SWMU 64.

SITE LOCATION

Keesler Air Force Base (AFB) is located within the city limits of Biloxi, Harrison County, Mississippi, approximately 80 miles east of New Orleans, Louisiana and 60 miles west of Mobile, Alabama. SWMU 64 is located in the southeastern portion of Keesler AFB at the corner of Z Street and L Street.

SITE DESCRIPTION

The Old Military Service Station (SWMU 64) is located in the highly developed, southeastern portion of the Base along Z Street, west of Building 4002, and within 60 meters of the petroleum, oil, and lubricants (POL) area. Ten abandoned steel underground storage tanks (USTs) were associated with this site. Six of the tanks were used to store automotive gasoline, one was used to store kerosene, two were used to store diesel fuel, and one was used to store mixed solvents. The USTs were placed in service between 1941 and 1955, closed in 1965, and removed from the site in 1987. Following tank excavation and removal, the former tank pits were backfilled with clean soils and then paved with asphalt. This site is now a part of Z Street.

Additional information on SWMU 64 can be found in the RCRA Facility Investigation Report for the Group 1 Sites (Parsons, April 1999) and the Statement of Basis for SWMU 64, (Parsons, October 1999). These documents are available in the Keesler AFB Administrative Record and Information Repository.

LAND USE CONTROL OBJECTIVES

The recommended corrective action for SWMU 64 included long-term groundwater monitoring and land use controls. Investigations and studies conducted at the site indicate that potential risks do exist to receptors. Long-term monitoring of groundwater will be conducted and evaluated annually until contaminant concentrations drop below corrective action objectives or until the USEPA and MDEQ decide the sampling interval can be extended or it is no longer necessary to continue. Two wells (MW10-3 and MW10-4) will be sampled annually. The samples will be analyzed for arsenic. The Project Plan for Long-Term Monitoring for SWMU 64 (Parsons, September 1999) contains the details of the required monitoring.

The purpose of establishing LUCs for SWMU 64 is to ensure that the corrective measures are protective of human health and the environment. The human health risk assessment conducted for this site determined that subsurface soil and groundwater pose a potential risk to future industrial workers. Therefore, current and future use of the property will be restricted and residential development will not be allowed without further corrective action to reduce or eliminate the potential risks. Groundwater withdrawal or use will not be allowed within the boundaries of or near the site. The area affected by the LUCs is shown on **Figure 1**. This figure shows both the land use restrictions area and the shallow groundwater use restrictions area. This LUCIP also serves as a Corrective Measures Implementation Plan (CMIP), as required to implement a remedy, pursuant to RCRA.

LAND USE CONTROL IMPLEMENTATION TO ACHIEVE OBJECTIVES

By separate Memorandum of Agreement (MOA) dated August 15, 2000, USEPA and Keesler AFB, on behalf of the Department of the Air Force, agreed to implement basewide, certain periodic site inspections, condition certification, and agency notification procedures designed to ensure the maintenance by Keesler AFB personnel of any site specific LUCs deemed necessary for future protection of human health and the environment. In addition to the LUCs, long-term monitoring of groundwater has been implemented.

The Environmental Restoration Program Manager (ERPM) will be responsible for implementing and maintaining the LUCs and this LUCIP will be referenced in appropriate Keesler AFB basewide planning documents. The LUCs established for SWMU 64 are listed below and the implementation and maintenance procedures are described in detail in the following section of this document.

- The property is restricted from residential use or development.
- The shallow aquifer under or near the site shall not be used as a water supply source for any use: potable, industrial, or irrigation.
- Digging into the land surface and soil removal are prohibited without approval of the ERPM.
- No structure shall be built on the site without prior notification and approval of the ERPM.
- Maintenance or replacement of existing underground utilities in the same or new locations on the site is restricted without notification and approval of the ERPM.

DOCUMENTING AND MAINTAINING LAND USE CONTROLS

- For major land use changes, written requests will be submitted to USEPA in accordance with the mutually approved LUCAP. Requests will be submitted as soon as a major land use change is anticipated, to allow 90 days for regulatory review and review of remedy selection decision documents.

- The site will be inspected on an annual basis to document the status and to ensure that unauthorized use does not occur. The SWMU 64 Land Use Controls Annual Inspection Checklist is included as **Attachment A**. The Air Force will submit an annual site status report to USEPA in accordance with the LUCAP. The Air Force will notify USEPA upon the discovery of any unauthorized change in land use.
- These LUCs will be documented in the Keesler AFB Basewide Comprehensive Plan on an annual basis.
- SWMU 64, as referenced in the LUCs detailed above, is the area shown on **Figure 1**.

RECURRENT REVIEW OF LAND USE CONTROLS

Revalidation of LUCs will be conducted every five years to determine if it is appropriate to amend or remove them. At each revalidation, Keesler AFB will evaluate whether site conditions warrant LUC removal or amendment consideration. If so, requirements for any assessment activities based on risk consideration will be evaluated by Keesler AFB and USEPA. A revalidation request report will be prepared by Keesler AFB and submitted to USEPA.

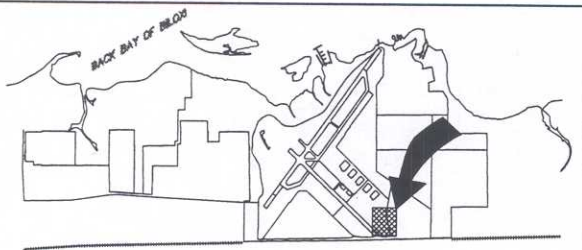
MAJOR LAND USE CHANGE EVALUATION

To be considered for a land use change, reassessment of corrective actions for SWMU 64 will be conducted by Keesler AFB as part of the RCRA Permit. Additional investigations and studies may be required to evaluate any proposed changes.

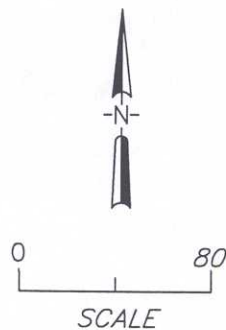
DECISION DOCUMENTS

The recommendations from the Statement of Basis for SWMU 64 dated October 1999 were long-term groundwater monitoring and land use controls. This SB was open for public comment from January 13, 2000 to February 26, 2000. The SB was approved in March 2000.





Figure 1
SWMU 64
Land Use and Shallow Aquifer Restrictions Area



KEY MAP



LEGEND

-  Monitoring Well
-  Location of Abandoned UST(s)
-  General Groundwater Flow Direction
-  Affected Area

Attachment A

Site ST-07 (SWMU 64) Land Use Controls Annual Inspection Checklist

ATTACHMENT A

Site ST-07 (SWMU 64) Land Use Controls Annual Inspection Checklist

DATE _____

DATE OF PREVIOUS INSPECTION _____

TIME _____

DATE OF NEXT PERIODIC REVIEW _____

NAME _____

If the answer to any of the following questions deviates from the prescribed LUC, please describe and explain on the attached comment sheet.

Land Use Control	Inspection
The property is restricted from residential use or development (Figure 1).	Figure 1 depicts development restrictions. Has residential development occurred within the restricted area? Yes No
The shallow aquifer under or near ST-07 shall not be used as a water supply source for any use – potable, industrial, or irrigation.	Figure 1 depicts shallow aquifer use restrictions. Have any wells been completed into the shallow aquifer within the restricted area? Yes No
Digging into the land surface and soil removal are prohibited without approval of the Environmental Restoration Program Manager (ERPM).	Has digging or excavation taken place on the site? Yes No Was the ERPM notified and was a health and safety plan prepared and approved? Yes No
Maintenance of existing utilities or replacement of existing utilities in the same or new location is restricted without prior notification of the ERPM.	Have utilities been worked on or replaced, within the buffer zone? Yes No If yes, did the ERPM provide approval? Yes No
No structure shall be built on the site without prior notification and approval of the ERPM.	Have any structures been built on the site? Yes No If yes, did the ERPM provide approval? Yes No

This property will be inspected on an annual basis to document the status of the site and to ensure that unauthorized use of the property does not occur.	<p>Was last year's annual inspection for ST-07 completed?</p> <p>Yes No</p>
The Air Force will submit an annual site status report to the USEPA in accordance with the mutually approved LUCAP. The Air Force will notify USEPA upon the discovery of any unauthorized change in land use.	<p>Was last year's annual report submitted to the USEPA?</p> <p>Yes No</p> <p>Did any unauthorized land use changes occur within the last year?</p> <p>Yes No</p> <p>If yes, on what date was the USEPA notified?</p>
For proposed major land use changes,* written requests will be submitted to the USEPA, in accordance with the mutually approved LUCAP. Requests will be submitted as soon as a major land use change is anticipated, to allow sufficient time for regulatory review and amendments to remedy selection decision documents.	<p>Have any major land use changes been requested, since the last inspection report?</p> <p>Yes No</p>
These Land Use Controls will be documented in the Keesler AFB Basewide Comprehensive Plan on an annual basis.	<p>Have the Land Use Controls been documented and distributed?</p> <p>Yes No</p>

* Major Land Use Change = Any changes in land use (e.g., from industrial or recreational to residential) that would be inconsistent with those specific exposure assumptions in the human health and/or ecological risk assessments that served as the basis for the LUCs; any site activity that may disrupt the effectiveness of the implemented LUC (for example, excavation at a landfill; groundwater pumping that may impact a groundwater pump and treat system; a construction project that may impact ecological habitat protected by the remedy; removal of a fence; unlocking of a gate, or removal of warning signs); or any site activity intended to alter or negate the need for the specific LUCs implemented at the site.